

# **EXHIBIT E**

# BEXLEY BEAUMONT

Mr Daniel Thomas  
34 Botley Gardens  
Southampton  
SO19 0SW

Bexley Beaumont Limited  
Union  
Albert Square  
Manchester  
M26LW

Date: 9th December 2020  
Our Ref: ESC.2020-289  
Contact: erincowley@bexleybeaumont.com

Dear Mr Thomas

## Assistance

I represent Sidney L. Gold Associates who act on behalf of the Middle East Forum.

My client wishes to speak to you in relation to two matters.

Firstly, you will be aware that proceedings are in motion in the US between Lisa Barbounis and the Middle East Forum. The US lawyers have evidence to show that you were aware that Miss Barbounis' claim against the Middle East Forum and Greg Roman was unsubstantiated. They are also of the view that you were prepared to assist them with their case, albeit some time ago.

Secondly, there is an outstanding financial matter involving the Middle East Forum.

These matters are of some urgency, I should be grateful if you would revert to me within 14 working days.

Yours faithfully,

Bexley Beaumont

Erin Cowley  
Bexley Beaumont Limited

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Mr Daniel Thomas  
34 Botley Gardens  
Southampton  
SO19 0SW

Bexley Beaumont Limited  
Union  
Albert Square  
Manchester  
M26LW

Date: 11th January 2021  
Our Ref: ESC.2020-289  
Contact: erincowley@bexleybeaumont.com

Dear Mr Thomas,

**Sidney L. Gold & Associates**

I refer to the above and to my email of 30<sup>th</sup> December 2020. I am slightly surprised not to have received at least an acknowledgment.

My client would very much like to secure your account on a voluntary basis. However, if your co-operation is not forthcoming, they will have no option but to obtain it by compulsory means under the Hague Convention. This process is of course, not without cost.

I look forward to hearing from you by return.

Yours faithfully,

Bexley Beaumont

**Bexley Beaumont Limited**

13:07



< Inbox 2 Messages **Message for Erin Cowl...** ^ v

Begin forwarded message:

**From:** Daniel Thomas

[<dannytommo123@icloud.com>](mailto:dannytommo123@icloud.com)

**Date:** 28 December 2020 at 11:07:49

GMT

**To:** BB <[BB@bexleybeaumont.com](mailto:BB@bexleybeaumont.com)>

**Subject:** Message for Erin Cowley - MEF  
- Daniel Thomas

Hi Erin,

I've received a letter from yourself  
regarding MEF in USA.

Please can you contact me on  
[07900171112](tel:07900171112) at your earliest convenience.

Thank you

Daniel Thomas

Sent from my iPhone

See More



Erin Cowley

11:40



20:09



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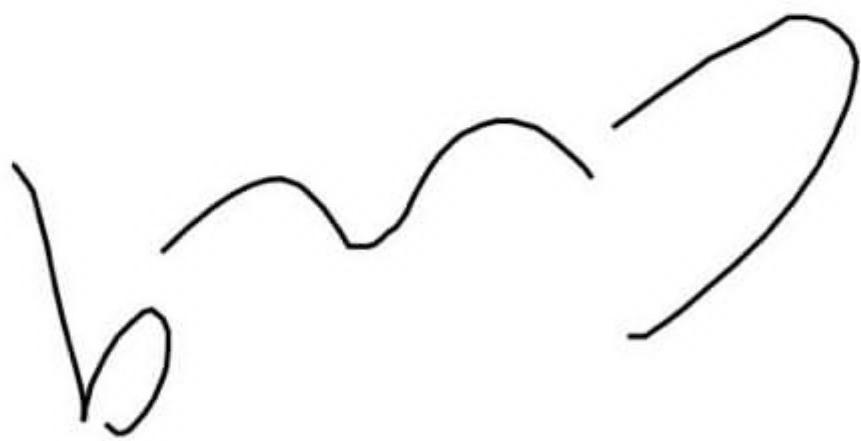
Delivered

Tracking no. VE853111892GB

Your item was delivered on **12-12-2020**.

Service used:

Royal Mail Special Delivery Guaranteed 1pm™



Not the signature you expected? [Find out why.](#)

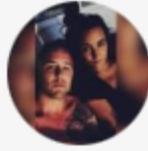
Signed for by: THOMAS



Tracking Assistant



07:24



Danny thomas



Wed 17 Feb

🔒 Messages and calls are end-to-end encrypted. No one outside of this chat, not even WhatsApp, can read or listen to them.

Tap to learn more.

Hey, You mentioned earlier you might be able to find some info out about what's happening or what the papers may be interested in... if you can find out and let's have another convo, because if it's damaging enough on me I may need to response. Thanks Erin x

16:28

Hey Danny. Let me find out and I'll come back to you. You free to talk tomorrow morning sometime?

17:35 ✓

Yer no problem, ring me when you're ready to talk. I'd like to have a detailed insight on how the case in the US is going and how it's looking as it moves forward. I'm up north work this week, happy for you show me in detail, so I can make a final decision if that's possible. I just need to make the right choice!

20:34



Thu 18 Feb

